



March 14, 2014

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Expression of Interest of Suddenlink Communications, Inc.; Connect America Fund,
WC Docket No. 10-90**

Dear Ms. Dortch:

On behalf of Suddenlink Communications (“Suddenlink”) and in response to the Commission’s IP Transition and Rural Broadband Experiments Report and Order, Suddenlink hereby expresses its interest in potentially participating in the Commission’s rural broadband experiments.¹ Whether Suddenlink ultimately submits a formal proposal is contingent on Suddenlink’s further analysis of potential service areas as well as its assessment of unresolved issues, some of which may be addressed in the Commission’s forthcoming Further Notice of Proposed Rulemaking (“FNPRM”).

Suddenlink is a broadband communications company providing advanced digital video, Internet and voice services over a scalable hybrid network of fiber and coaxial facilities. Suddenlink is not currently an eligible telecommunications carrier (“ETC”) but will obtain such status if awarded funds in this program.

Proposed Service Area

Suddenlink has reviewed eligible areas in its’ current service footprint and would propose to extend broadband, voice and video service to the following unserved rural communities using a one-time grant of funds:

¹ See *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Connect America Fund; Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Numbering Policies for Modern Communications*, GN Docket No. 13-5, GN Docket No. 12-353, WC Docket No. 10-90, CG Docket No. 10-51, CG Docket No. 03-123, and WC Docket No. 13-97, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 at para. 82-136 (rel. Jan. 31, 2014) (“Order”).

<u>Municipality</u>
Hugo, OK
Monahans, TX
Pecos, TX
Poteau, OK
Purcell, OK
Stuttgart, AR
Trenton, MO
Ville Platte, LA
White Hall, AR

Suddenlink will provide a list of the affected Census Blocks in these communities if it decides to proceed with a filing in the experiment.

Proposed Broadband Offering

Suddenlink proposes to use one time funding of approximately \$5,328,000 for last mile plant hardening and headend improvements in these rural areas. The last mile network facility upgrades would allow Suddenlink to offer more robust Internet services with speeds up to 30Mbps download and 2Mbps upload. In order to make these speeds possible, Suddenlink would provide approximately \$5,274,000 of its own funds to complete the needed middle mile links to these communities. The provision of broadband service to these areas would not be economically feasible absent participation in this experiment.

Proposed Phone and Video Offerings

The plant improvements would also allow Suddenlink to provide competitive voice service in these systems at a reasonable cost. Suddenlink currently provides video service in these communities. The proposed one time grant funding would allow us to upgrade these systems to all digital and provide up to 40 High Definition Channels as well as several hundred standard definition channels at competitive prices.

Local Government and Anchor Institution Participation

Suddenlink currently holds local video franchises in each of these areas which would allow immediate access to the public rights of way for construction. We would expect to partner with the communities to improve broadband penetration if we were to receive a grant. In addition to serving residential and business customers, Suddenlink also routinely works with and offers its services to community anchor institutions such as schools, libraries, and other local government entities and would envision continuing this approach as part of any proposed experiment.

Suddenlink's participation in the experiments will be contingent upon clarification from the Commission regarding specific parameters surrounding eligible service areas, build out schedules and ongoing service provider obligations. As other filers have noted, it is unclear whether experiment proposals will require service to an entire unserved area within a census tract, or to some portion of the tract. Given the size of some tracts in Suddenlink's service areas, a requirement to provide service throughout an entire tract may preclude participation in the experiment. In addition, it is not clear whether recipients of one-time funding, as contemplated by Suddenlink, would be required to meet specific build-out schedules; or if such a schedule would be required if recipients elected on-going annual support. Finally, although the Commission has indicated that participants will be required to comply with "all relevant" universal service rules, it is not clear whether the Commission will adopt additional rules. As such, Suddenlink's decision to participate is contingent on resolution of these, and other, open issues.

Suddenlink appreciates the opportunity to submit this non-binding expression of interest to assist the Commission with the development of successful rural broadband experiments. As noted above, Suddenlink's participation in the subsequent formal proposal stage will be contingent upon further analysis of eligible service areas, and resolution and development of reasonable rules associated with the distribution of support under the experiment.

Please feel free to contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink, reading "Michael Zarrilli". The signature is fluid and cursive, with the first name "Michael" and last name "Zarrilli" clearly distinguishable.

Michael J. Zarrilli
Vice President
Government Relations &
Senior Counsel